

# Exhibit A

To the Declaration of J. Michael Keyes in Support of  
Defendant's Opposition to Plaintiff's Motion to Exclude  
and/or Strike Defendant's Expert Witness and Report

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8 Attorney for Plaintiff

9 Michael Grecco Productions, Inc.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 MICHAEL GRECCO  
12 PRODUCTIONS, INC.,

13 Plaintiff,

14 v.

15 TIKTOK INC.,

16 Defendant.

Civil Action No. 2:24-cv-04837-FLA-  
MAR

**PLAINTIFF’S INITIAL  
DISCLOSURES**

19 Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, plaintiff  
20 Michael Grecco Productions, Inc. (“Plaintiff”) hereby provides to defendant  
21 TikTok, Inc. (“Defendant”) the following initial disclosures. These disclosures are  
22 based on information now reasonably available to Plaintiff. Plaintiff reserves the  
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24

right to supplement, amend, or modify these disclosures as it obtains information through discovery or otherwise becomes aware of additional information.

**INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

The following individuals are believed to have discoverable information that Plaintiff may use to support its claims or defenses. Plaintiff reserves the right to identify additional individuals if it learns that any such persons have information that Plaintiff may use to support its claims or defenses.

Individual and Location	Subject Matter
Michael Grecco c/o Copycat Legal PLLC 3111 N. University Drive Suite 301 Coral Springs, FL 33065	Information concerning the subject photograph, Plaintiff's efforts to sell/license its library of professional photography, and discovery of Defendant's use of the subject photograph.
Elizabeth Waterman c/o Copycat Legal PLLC 3111 N. University Drive Suite 301 Coral Springs, FL 33065	Information concerning the subject photograph, Plaintiff's efforts to sell/license its library of professional photography, and discovery of Defendant's use of the subject photograph.
Torina Yamada c/o Copycat Legal PLLC 3111 N. University Drive Suite 301 Coral Springs, FL 33065	Information concerning the subject photograph, Plaintiff's efforts to sell/license its library of professional photography, and discovery of Defendant's use of the subject photograph.
TikTok, Inc. c/o Dorsey & Whitney LLP 701 Fifth Avenue, Suite 6100 Seattle, WA 98104	Information concerning Defendant's affirmative defenses, Defendant's publication/display of the subject photographs, Defendant's

Individual and Location	Subject Matter
	profits/revenue generated therefrom, and Defendant's prior payment of licensing fees for photographs.

**LOCATION AND DESCRIPTION OF DOCUMENTS AND THINGS**

Plaintiff will make available to Defendant for inspection and copying, as provided by Federal Rule of Civil Procedure 34, all documents, data collections, and tangible things in its possession, custody or control that may be used by it (other than solely for impeachment purposes) to support its claims or defenses in this case. These documents are generally located on Plaintiff's computers and/or e-mail accounts. The categories of documents upon which Plaintiff currently intends to rely include the following:

1. Copyright Office registration materials for the subject photographs.
2. Documents showing Defendant's display of the subject photograph.
3. Communications with Defendant with respect to the subject photograph.
4. Prior licensing information with respect to Plaintiff's professional photography.

## COMPUTATION OF DAMAGES

Plaintiff seeks either actual damages/disgorgement of Defendant's profits or statutory damages in this lawsuit. Defendant's profits are currently unknown (as discovery is pending). Plaintiff will make an election of actual damages/disgorgement or statutory damages at the appropriate time. Because Plaintiff licenses its work on an annual basis, Plaintiff would calculate its actual damages by multiplying the license it would have charged by the number of years the photographs were published. Plaintiff needs further discovery of Defendant's usage to determine the license that would have been charged.

## INSURANCE AGREEMENTS

Plaintiff is not aware of any insurance agreement relevant to the claims asserted in this lawsuit.

Dated: April 15, 2025.

**COPYCAT LEGAL PLLC**

By: /s/ Lauren M. Hausman  
 Lauren M. Hausman, Esq.  
 Jonathan Alejandrino, Esq. (*pro hac vice*)  
 Attorneys for Plaintiff  
 Michael Grecco Productions, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 15, 2025, I served the foregoing document via e-mail to: Connor Hansen, Esq. ([Hansen.Connor@dorsey.com](mailto:Hansen.Connor@dorsey.com)), Michael Keyes, Esq. ([keyes.mike@dorsey.com](mailto:keyes.mike@dorsey.com)), and Dylan Harlow, Esq. ([Harlow.Dylan@dorsey.com](mailto:Harlow.Dylan@dorsey.com)).

/s/ Lauren M. Hausman

Lauren M. Hausman, Esq.